



Harter Secrest & Emery LLP

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November 18, 2020

**BY ECF**

Hon. George B. Daniels  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Room 1310  
New York, NY 10007-1312

Re: *United States of America v. Laurence Doud, III*, 19-cr-285 (GBD),  
Subpoena Adjournment Request

Dear Judge Daniels:

We write on behalf of our client, Rochester Drug Co-operative, Inc. (RDC), to respectfully request an additional two and a half-week *nunc pro tunc* adjournment of a so-ordered pre-trial subpoena deadline. Defendant Laurence Doud, III (Defendant), who served the subpoena, consents to this request.

As background, Defendant served RDC with a subpoena dated October 7, 2020, pursuant to Federal Rule of Criminal Procedure Rule 17. On October 19, 2020, this Court granted RDC's request to extend the deadline to November 17, 2020. RDC and Defendant have met and conferred regarding RDC's response to the subpoena. However, due to technical and staffing issues related to RDC's bankruptcy, RDC has encountered difficulties in collecting some of the requested documents.

Accordingly, RDC now writes to request an additional two and a half-week adjournment of the deadline from November 17, 2020 to December 4, 2020. Defendant and RDC have agreed to a rolling production of documents. The first production will occur on November 20, 2020. Such an adjournment will not prejudice Defendant, as no trial date has been scheduled yet in this matter. This is our second request for an extension. As noted, Defendant consents to this request.

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RDC thanks the Court for considering this submission. If you have any questions or require further information, please feel free to contact me.

Respectfully submitted,

Harter Secrest & Emery LLP

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